

known post-operative condition that leads to secondary loss of vision following cataract surgery.

At the time this specification was drafted, various names were in common use to describe the condition. These names included “after-cataract” (or “after cataract” depending on the convention adopted by the journal editor) and PCO (“posterior capsule opacification” or “posterior capsular opacification”).

Significantly, in preparing the specification for this application, the inventors were guided in the choice of the term “after-cataract” by Kappelhof and Vrensen (1992) (a copy of which is submitted herewith as part of an Invention Disclosure Statement), who raised a valid objection to the use of the term “posterior capsule opacification” or PCO.

Notably, the term “after-cataract” (or “aftercataract”) is used in a number of other reputable ophthalmological journals to describe the subject condition. For example, in addition to the Kappelhof article, the term is used in each of the references listed in the Information Disclosure Statement filed concurrently herewith.

It is to be further noted that the nature of the “after-cataract” condition is also described at lines 19-24 on page 1 of the specification. Moreover, a method of preventing or controlling “after-cataract” formation is clearly described in the specification at lines 17-22 on page 2. Furthermore, lines 2-7 on page 4 of the specification clearly states that the treatment described in the specification can be used as an adjunct to eye surgery to inhibit cataract-related changes which may occur as a result of surgical intervention as, for example, “in the formation of ‘after-cataract’ following the implantation of synthetic lens material.” Lines 2-4 on page 4 clearly teach that the various methods of treatment described from line 37 on page 2 to the end of page 3 of the

specification can be used to prevent or control "after-cataract" formation in the eye of a mammalian subject.

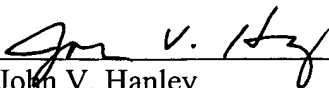
Therefore, in view of the fact that there are references which clearly demonstrate that the term "after-cataract" is commonly used by those skilled in the relevant art and the fact that the specification clearly provides sufficient information for a person skilled in the art to prevent or control after-cataract formation in the eye of a mammalian subject using the method of the invention, it is respectfully submitted that the phrase "after-cataract formation" does indeed provide an enabling disclosure. As such, the present application provides sufficient guidance for a person skilled in the art to practice the instant invention without undue experimentation. Accordingly, it is respectfully submitted that the Section 112, first paragraph rejection of claims 14-28 and 34-38 is thereby traversed.

### CONCLUSION

Applicants have attempted to respond to each rejection in the Office action. In view of the above remarks, Applicants respectfully request that the application be reconsidered, the claims allowed and the application passed to issue.

Respectfully submitted,

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